

Exhibit B



Suite 1150 North
600 13th Street, N.W.
Washington, D.C. 20005

July 30, 2020

VIA FEDERAL EXPRESS

Mr. Sundar Pichai
Chief Executive Officer
Alphabet, LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

RE: TELEGRAM APP'S ROLE INCITING EXTREMIST VIOLENCE

Dear Mr. Pichai,

I am writing to you in my capacity as President of the Washington and New York-based Coalition for a Safer Web (CSW) (www.coalitionsw.org). CSW is a non-partisan, not-for-profit organization. Our Advisory Board is chaired by former Homeland Security Secretary Governor Tom Ridge.

CSW's mission is to accelerate the de-platforming of extremist and hate incitement from social media platforms. Our accomplishments have been widely reported in media coverage, most recently in *The Hill*, *Washington Post* and in *POLITICO Tech*.

I wish to draw to your attention to the increasingly dangerous role which the TELEGRAM mobile phone application in Google's Play Store is serving to facilitate and incite violence against Jews and African Americans by transnational white nationalist extremist groups – many affiliated with the Russian Government's Internet Research Agency.

Because of the increasing prevalence of Russian and Eastern-European anti-Semitic extremist neo-Nazi groups utilizing TELEGRAM, CSW commenced an in-depth research investigation earlier this year into its role. Our research revealed serious instances whereby TELEGRAM's end-to-end encryption service was enabling

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Russian Government-back anti-Semitic/neo-Nazi extremist groups to recruit, organize, and inspire global terrorist networks, including enabling extremist groups to hawk merchandise to support their organizations. Our research was shared with the media and with federal authorities.

Subsequently, the murder of George Floyd triggered a massive volume of anti-black incitement on TELEGRAM. In fact, CSW was able to intercept real time communications on TELEGRAM by domestic white nationalist extremists directing its followers to specific urban locations to attack protesters and instigate instances of looting to cast blame on peaceful black protesters. This research was disclosed in CSW's initial June 3 press release (enclosed).

On June 18, CSW issued a second TELEGRAM-related press release (also enclosed) further disclosing TELEGRAM's role as the primary communications channel for Russian government and affiliated neo-Nazi and white nationalist groups, sowing misinformation and racial division in the United States and in Europe, with the goal of provoking black-on-Jew violence.

TELEGRAM is owned by Russian-born Pavel Durov who, along with his management team, operates from Dubai in the United Arab Emirates (UAE). CSW has provided the UAE Government with a summary of our research and has requested it to urge TELEGRAM's management to take immediate action to curtail TELEGRAM's role facilitating racial and religious violence in the United States and elsewhere. We have not yet had the benefit of response to our request.

TELEGRAM's management certainly must be aware of the mounting complaints against it since 2017. Many reputable investigative organizations have conducted their own research onto TELEGRAM (referenced below) which have been cited in the media. In fact, TELEGRAM has provided such a hospitable open-door environment to ISIS, Nazis, racists, and the far-right conspiracy group QAnon, that many refer to it as "Terrorgram."

To support its operations TELEGRAM commenced in late 2017 a cryptocurrency venture known as the "TELEGRAM Open Network (TON)." TON has enabled the Russian Imperial Movement - a designated extremists neo-Nazi U.S. designated terrorist group - to buy and sell supplies to raise funds. TELEGRAM was able to raise \$1.7 billion from "investors" and TON continues to enable extremist groups to engage in encrypted financial transactions even though the SEC designated TON an

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illegal financing venture and a federal court blocked any further TON transactions, but by the time the SEC acted the genie was out of the bottle. TON enabled TELEGRAM to raise \$1.7 billion for its users to expand its global footprint.

CSW is calling on Google to (temporarily) de-platform the TELEGRAM app from Google's Play Store until TELEGRAM's management adopts a responsible, and verifiable, code of conduct which bars anti-Semitic/racist content, extremist accounts, and incitements to violence. By taking this action Google will serve notice on TELEGRAM that it will no longer condone TELEGRAM's role as a purveyor of hate, racism, and terrorism.

Of course, we realize that it would be impossible for Google to remove the TELEGRAM App from its devices already in use by its customers. However, as with the current ad boycott against Facebook declared by the #StopHateForProfit coalition, social media platforms and applications must be held accountable for their conduct enabling hate and extremism. TELEGRAM's record of ambivalence, indeed contempt, for those calling on it to take remedial measures (as referenced in the many research reports cited below) compels Google to step in as one of the few corporations which can hold TELEGRAM's financial feet to the fire.

CSW and its partners look forward to collaborating with Google's management in the immediate days to serve the public's interest. Please note that CSW is sending a comparable letter to Apple management to request it to (temporarily) remove TELEGRAM from its iPhone app store until TELEGRAM's management takes remedial actions, as well.

Set forth below is a representative compilation of recent releases and reports issued regarding TELEGRAM. Thank you for your attention to this important issue.

Very truly yours,

Amb. Marc C. Ginsberg
President
Coalition for a Safer Web

Enclosures: As Stated

COALITION FOR A SAFER WEB research & press releases

June 03, 2020 – CSW Demands Action Against the TELEGRAM White Nationalist/Anti-Semitic/Anti-Black Riot Incitement App

June 18, 2020 – TELEGRAM App is the Misinformation “Super Spreader” to Foment U.S. Racial Division & Violence

June 22, 2020 – TELEGRAM App Deployed by Extremists to Foment July 28 “It’s Going Down” Violence Against Portland Authorities

THIRD PARTY REPORTS & PRESS ON TELEGRAM – Select References

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<https://medium.com/the-innovation/nazis-and-cryptocurrency-the-evolution-of-telegram-10b30681c240>
2. Institute for Strategic Dialogue: June 26, 2020: “A Safe Place to Hate: White Supremacist Mobilisation on TELEGRAM -- by Jakob Guhl & Jacob Davey
<https://www.isdglobal.org/isd-publications/a-safe-space-to-hate-white-supremacist-mobilisation-on-telegram>
3. “Men Wearing Hawaiian Shirts & Carrying Guns Add a Volatile New Element to Protests”, June 3, 2020, The Washington Post
<https://www.washingtonpost.com/technology/2020/06/03/white-men-wearings-hawaiian-shirts-carrying-guns-add-volatile-new-element-floyd-protests>
4. “How TELEGRAM Became a Safe Haven for Pro Terror Neo Nazis”, March 2020, WIRED
<https://www.wired.co.uk/article/hope-not-hate-telegram-nazis>
5. “ENCRYPTED EXTREMISM – Inside the English - Speaking Islamic State Ecosystem on TELEGRAM”, June 2019, George Washington University Program on Extremism
<https://extremism.gwu.edu/sites/g/files/zaxdzs2191/f/EncryptedExtremism.pdf>
6. “Far Right Terrorists Are Calling For Terrorism on Messaging APP TELEGRAM”, June 27, 2019, The Southern Poverty Law Center
<https://www.splcenter.org/hatewatch/2019/06/27/far-right-extremists-are-calling-terrorism-messaging-app-telegram>

7. **“How TELEGRAM Became White Nationalists’ Go-To Messaging Platform”**
October 7, 2019, VICE https://www.vice.com/en_us/article/59nk3a/how-telegram-became-white-nationalists-go-to-messaging-platform
8. **“A Growing Frontier for Terrorist Groups: Unsuspecting Chat Apps**
January 8, 2019, WIRED – by Rita Katz <https://www.wired.com/story/terrorist-groups-prey-on-unsuspecting-chat-apps>
9. **“Terrorists’ Love of TELEGRAM, Explained”,** June 30, 2017, VOX
<https://www.vox.com/world/2017/6/30/15886506/terrorism-isis-telegram-social-media-russia-pavel-durov-twitter>